

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES, *et al.*.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

No. 1:23-cv-00108-LMB-JFA

The Honorable Leonie M. Brinkema

[PROPOSED] ORDER

Before this Court is Non-Parties Omnicom Group Inc., DDB Worldwide Communications Group LLC, GSD&M LLC, Porter Novelli Public Services Inc. and OMD USA LLC's Objections to the Public Use Of, And Motion to Seal Certain Trial Exhibits. The identified trial exhibits contain confidential, financial, proprietary, and competitively sensitive business information belonging to the Omnicom Entities, which could cause significant harm to the business of the Omnicom Entities and their respective clients if released publicly. These materials and information satisfy the requisite sealing standards.

It is hereby ORDERED that the aforementioned Motion to Seal is **GRANTED** as to the following:

1. Defendant's Trial Exhibit No. 378 (DTX 378), excerpts at ARMY-ADS-0000245462-001 – ARMY-ADS_0000245462-050
2. Defendant's Trial Exhibit No. 630 (DTX 630), highlighted portions of CMS-ADS-0000181785 and CMS-ADS-0000181786

3. Defendant's Trial Exhibit No. 631 (DTX 631), highlighted portions of CMS-ADS-0000191004 and CMS-ADS-0000191005
4. Defendant's Trial Exhibit No. 835 (DTX 835), excerpts at USAF-ADS-0000110451 – USAF-ADS-0000110453
5. Defendant's Trial Exhibit No. 878 (DTX 878): highlighted portions of USAF-ADS-0000506007 – USAF-ADS-0000506015
6. Defendant's Trial Exhibit No. 940 (DTX 940), in its entirety
7. Defendant's Trial Exhibit No. 1107 (DTX 1107), highlighted portions of USAF-ADS-0000771834, excerpts at USAF-ADS-0000771834_0002- USAF-ADS-0000771834_0016
8. Defendant's Trial Exhibit No. 1113 (DTX 1113), excerpts at ARMY-ADS-0000245861 – ARMY-ADS-0000245871
9. Defendant's Trial Exhibit No. 1140 (DTX 1140), attachment in its entirety at ARMY-ADS-0000179831
10. Defendant's Trial Exhibit No. 1151 (DTX 1151), in its entirety
11. Defendant's Trial Exhibit No. 1152 (DTX 1152), excerpts at USAF-ADS-0000022406 – USAF-ADS-0000022485
12. Defendant's Trial Exhibit No. 1163 (DTX 1163), highlighted portions of ARMY-ADS-0000336340, all attachments in their entirety at ARMY-ADS-0000336341 – ARMY-ADS-0000336660
13. Defendant's Trial Exhibit No. 1172 (DTX 1172), in its entirety
14. Defendant's Trial Exhibit No. 1228 (DTX 1228), excerpts at USAF-ADS-0000793801 – USAF-ADS-0000793803 and USAF-ADS-0000793805 – USAF-

ADS-0000793811

15. Defendant's Trial Exhibit No. 1242 (DTX 1242), attachment in its entirety at ARMY-ADS-0000060559
16. Defendant's Trial Exhibit No. 1249 (DTX 1249), attachment in its entirety at ARMY-ADS-0000329949 – ARMY-ADS-0000329970
17. Defendant's Trial Exhibit No. 1267 (DTX 1267), attachment in its entirety at ARMY-ADS-0000134181 – ARMY-ADS-0000134222
18. Defendant's Trial Exhibit No. 1280 (DTX 1280), excerpts at CMS-ADS-0000536747 – CMS-ADS-0000536794
19. Defendant's Trial Exhibit No. 1294 (DTX 1294), excerpts at USAF-ADS-0000861539 – USAF-ADS-0000861606
20. Defendant's Trial Exhibit No. 1299 (DTX 1299), excerpts at ARMY-ADS-0000007772 – ARMY-ADS-0000007777
21. Defendant's Trial Exhibit No. 1318 (DTX 1318), excerpts at USAF-ADS-0000005727 – USAF-ADS-0000005787
22. Defendant's Trial Exhibit No. 1327 (DTX 1327), in its entirety
23. Defendant's Trial Exhibit No. 1333 (DTX 1333), excerpts at ARMY-ADS-0000064499 – ARMY-ADS-0000064506 and ARMY-ADS-0000064508 – ARMY-ADS-0000064520, and highlighted portion at ARMY-ADS-0000064497 and ARMY-ADS-0000064507
24. Defendant's Trial Exhibit No. 1336 (DTX 1336), in its entirety
25. Defendant's Trial Exhibit No. 1347 (DTX 1347), excerpts at USAF-ADS-0000001424 – USAF-ADS-0000001476

26. Defendant's Trial Exhibit No. 1373 (DTX 1373), highlighted portions of ARMY-ADS-0000045770, all attachments (5 Excel spreadsheets) in their entirety at ARMY-ADS-0000045772 – ARMY-ADS-0000045778
27. Defendant's Trial Exhibit No. 1381 (DTX 1381), highlighted portions of CMS-ADS-0000529199 - CMS-ADS-0000529200
28. Defendant's Trial Exhibit No. 1394 (DTX 1394), highlighted portions of CMS-ADS-0000593107, excerpts at CMS-ADS-0000593108 – CMS-ADS-0000593109, attachment (Excel spreadsheet) in its entirety at CMS-ADS-0000593110
29. Defendant's Trial Exhibit No. 1399 (DTX 1399), highlighted portions of CMS-ADS-0000626504 – CMS-ADS-0000626506, attachment (Excel spreadsheet) in its entirety at CMS-ADS-0000626507
30. Defendant's Trial Exhibit No. 1400 (DTX 1400), highlighted portion of ARMY-ADS-0000043190 and ARMY-ADS-0000043191, all attachments (13 Excel spreadsheets) in their entirety at ARMY-ADS-0000043192 – ARMY-ADS-0000043204
31. Defendant's Trial Exhibit No. 1461 (DTX 1461), highlighted portions of CMS-ADS-0000531033, excerpts at CMS-ADS-0000531034 – CMS-ADS-0000531072

The foregoing shall remain permanently under seal. IT IS SO ORDERED.

Entered this __ day of _____, 2024.

Alexandria, Virginia

Leonie M. Brinkema
United States District Judge